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June 14, 2018

<u>Doe v. The Northwestern Mutual Life Insurance Company</u> Civil Action No.: 1:17-cv-00510-LDH-CLP

Dear Judge Pollak:

With the consent of Defendant's counsel, I write on behalf of Plaintiff and Defendant in the above-referenced action to submit a joint request to amend the Court's March 14, 2018 electronic scheduling order (the "Scheduling Order").

The parties exchanged initial expert disclosures on May 25, 2018, as set forth in the Scheduling Order. Plaintiff submitted one expert report, pursuant to Rule 26(a)(2)(B), and six disclosures for his treating physicians as non-retained experts, pursuant to Rule 26(a)(2)(C). Defendant submitted four expert reports. The Scheduling Order does not set a deadline for the parties to exchange rebuttal expert reports, and the parties propose August 3, 2018 as that deadline. In order to give the parties the opportunity to exchange rebuttal expert reports before commencing expert depositions, the parties request an extension from August 15, 2018 to September 28, 2018 to complete expert depositions.

Respectfully,

Samira Shah

Hon. Cheryl L. Pollak
United States District Court
Eastern District of New York
225 Cadman Plaza East, Rm. 1230
Brooklyn, NY 11201

BY ECF

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